

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

APR 28 2016

OFFICE OF ENFORCEMENT AND COMPLIANCE ASSURANCE

CERTIFIED MAIL RETURN RECEIPT REQUESTED

IN THE MATTER OF: Adrenaline Truck Performance, LLC

ATTENTION:

Adrenaline Truck Performance, LLC 1854 E. Lanark St.

Meridian, ID 83642

Registered Agent for Adrenaline Truck Performance, LLC Robert Coddens 1854 E. Lanark St. Meridian, ID 83642 Robert Coddens, Member

3073 E. Red Tail Eagle, ID 83616

Emily C. Schilling Holland & Hart LLP

Suite 2200

Salt Lake City, UT 84101

Second Request for Information Under § 208(a) of the Clean Air Act, 42 U.S.C. § 7542(a)

The United States Environmental Protection Agency ("EPA" or "We") hereby requires Adrenaline Truck Performance, LLC, and any of its parent organizations, affiliates, predecessors, successors, and assignees ("you"), ¹ to submit certain information as part of an EPA investigation to determine your compliance with Section 203(a) of the Clean Air Act ("CAA"), 42 U.S.C. § 7522(a), and the applicable Motor Vehicle Regulations at 40 C.F.R. Parts 85 and 86. Examples of vehicles or engines regulated under these Parts include, but are not limited to, automobiles and pickup trucks. Appendix A provides definitions, some of which may differ from those in previous requests. Appendix B provides instructions for your responses to this Request for Information. Appendix C specifies the information that you must submit. Appendix D provides information about asserting a claim of confidentiality over information you submit in response to this Request for information. Appendix E contains language certifying the truth and completeness of your response. Appendix F is an Excel workbook provided by the EPA to organize your responses to Requests 1 through 6.

The EPA issues this Request for Information under Section 208(a) of the CAA, 42 U.S.C. § 7542(a). Under Section 208(a), the Administrator of the EPA may require any person who is subject to the CAA

¹ See definition 5 in Appendix A.

to provide information necessary to determine whether the person has acted in compliance with these requirements and the regulations promulgated thereunder. The Administrator has delegated this authority to the undersigned Director of the Air Enforcement Division, Office of Enforcement and Compliance Assurance.

A previous request was sent to you on October 28, 2015. In response to the information you submitted, the EPA now requests additional information and documentation to clarify answers provided in your first response.

You must submit this information to the EPA representative listed below within thirty (30) calendar days from the date of this Request for Information. Please carefully review the instructions, definitions, and specific requests as you prepare your response. If you anticipate being unable to fully respond to this Request for Information by this deadline, you must contact Tony Miller of my staff at (303) 312-7161, or miller.anthony@epa.gov, within fifteen (15) days of the date of this Request for Information and, with an appropriate justification, request an extension of time to answer some or all of the requests below. If timely submitted, the EPA will review your request and may extend the time in which your response must be provided.

Failure to provide the required information may result in a civil action pursuant to Section 205(b) of the CAA, 42 U.S.C. § 7524(b). Failure to provide all requested information in its entirety, and in the format requested, may result in additional inquiries and penalties. These inquiries may include additional written requests, inspections, or depositions as authorized by Sections 208 and 307 of the CAA, 42 U.S.C. §§ 7542(a)–(b) and 42 U.S.C. § 7607(a). It is important that your responses be clear, accurate, organized, and complete. The EPA will regard any submitted information that is misleading, false, incomplete, or submitted without regard to its accuracy as a violation of the CAA and/or criminal statutes.

Finally, you must submit all requested information under an authorized signature with the following certification (provided in Appendix E):

I certify under penalty of law that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including the possibility of fines or imprisonment pursuant to Section 113(c)(2) of the Clean Air Act, 42 U.S.C. § 7413(c)(2), and 18 U.S.C. §§ 1001 and 1341.

The EPA may use any information submitted in response to this Request for Information in an administrative, civil, or criminal action.

You are entitled to assert a business confidentiality claim covering all or part of the information you submit in response to this Request for Information, in accordance with the procedures described in the Confidentiality of Business Information ("CBI") regulations, 40 C.F.R. Part 2, Subpart B. However, no

CBI claim may be made with respect to emissions data as defined at 40 C.F.R. § 2.301(a)(2). You must specify the page, paragraph, and sentence when identifying the information subject to your CBI claim. Appendix D of this Request for Information specifies the assertion and substantiation requirements for business confidentiality claims. The EPA may, without further notice, provide the public with any information not subject to a CBI claim.

Please submit all requested information, via courier service or overnight delivery, to:

Tony Miller, Chemical Engineer, P.E. U.S. Environmental Protection Agency Office of Enforcement and Compliance Assurance 1595 Wynkoop Street, Mail Code: 8MSU Denver, CO 80202

Questions concerning this request for information should be directed to Tony Miller of my staff at (303) 312-7161, or miller.anthony@epa.gov.

Phillip A. Brooks

Director

Air Enforcement Division
Office of Civil Enforcement

Appendix A Definitions

- 1. All terms used in this Request for Information will have their ordinary meaning unless such terms are defined in the CAA, 42 U.S.C. §§ 7401–7671q, or the Motor Vehicle and Non-Road Regulations found at 40 C.F.R. Parts 85, 86, 89, 90, 1051, and 1068.
- 2. The term "information" means any written, recorded, or graphic matter of any nature whatsoever, regardless of how recorded, and whether original or copy, including but not limited to, the following: memoranda, reports, expense reports, books, manuals, instructions, financial reports, working papers, records, notes, letters, notices, confirmations, telegrams, receipts, appraisals, pamphlets, magazines, newspapers, prospectuses, interoffice and intraoffice communications, electronic mail ("email"), instant messages, calendars, contracts, cables, notations of any type of conversation, telephone call, meeting, or other communication, bulletins, printed matter, computer printouts, invoices, transcripts, diaries, analyses, returns, summaries, minutes, bills, accounts, estimates, projections, comparisons, messages, correspondence, press releases, circulars, financial statements, reviews, opinions, offers, studies and investigations, questionnaires and surveys, presentations, spreadsheets, and work sheets. The term "information" includes all drafts, preliminary versions, alterations, modifications, revisions, changes, and amendments to the foregoing, as well as any attachments or appendices thereto. The term "information" also means any graphic or oral records or representations of any kind (including, without limitation, photographs, charts, graphs, voicemails, microfiche, microfilm, videotapes, recordings, and motion pictures), electronic and mechanical records or representations of any kind (including, without limitation, tapes, cassettes, disks, computer server files, computer hard drive files, CDs, DVDs, back-up tape, memory sticks, recordings, and removable computer media such as thumb drives, flash drives, memory cards, and external hard drives), and other written, printed, typed, or other graphic or recorded matter of any kind or nature, however produced or reproduced, and whether preserved in writing, film, tape, electronic format, disk, videotape or otherwise. Information bearing any notation not part of the original text is considered to be separate information. A draft or non-identical copy is separate information within the meaning of this term.
- 3. The term "entity" means any natural person, corporation, partnership, limited liability company, sole proprietorship, joint venture, or any formal or informal group, organization or association.
- 4. The term "person" includes an individual, corporation, partnership, or association. *See* Section 302(e) of the CAA, 42 U.S.C. § 7602(e).
- 5. The term "ATP", "you", and "your" includes, but is not limited to, Adrenaline Truck Performance, LLC, and any of its affiliates, predecessors, successors, and assignees.

- 6. The term "Affiliated Organization" means any organization or entity associated with you as an agent, parent organization, predecessor corporation, subsidiary organization, or any organization, or entity acting in lieu of you or the entities named in Definition 5.
- 7. The term "applications" means all vehicle or engine configurations.
- 8. The term "emission related parts" means those parts installed for the specific purpose of controlling emissions, or those components, systems, or elements of design which must function properly to assure continued vehicle emission compliance, as defined in 40 C.F.R. § 85.2102.
- 9. The term "element of design" means any control system (*e.g.*, computer software, electronic control system, emission control system, computer logic), and/or control system calibrations, and/or the results of systems interaction, and/or hardware items on a motor vehicle or motor vehicle engine, as defined in 40 C.F.R. § 86.094-2.
- 10. The term "electronic control module" or "ECM" means a device that receives inputs from various sensors and outputs signals to control engine, vehicle, or equipment functions. The ECM uses software programming including calculations and tables of information to provide the appropriate outputs. Multiple electronic control modules may be incorporated in a single unit to control various engine, vehicle, or equipment functions. ECM can be a generic term but may refer specifically to the engine control module when discussing emission controls on vehicles and engines. Examples of electronic control modules include, but are not limited to, the Engine Control Module, OBD Control Modules, Powertrain Control Module ("PCM"), Transmission Control Module ("TCM"), Body Control Module ("BCM") and aftertreatment control module.
- 11. The term "engine tuner" or "tuner" means any device or product capable of accessing, altering, or replacing the software programming, calculations, computer logic, tables of information (*e.g.*, fuel timing maps), coding, or other content or information stored within or used by an electronic control module.
- 12. The term "engine tune" or "tune" means any combination of software programming, calculations, computer logic, tables of information (*e.g.*, fuel timing maps), coding, or other content or information, stored in any form, capable of affecting or controlling an electronic control module.
- 13. The term "selective catalytic reduction" or "SCR" includes systems which inject a reductant, such as diesel exhaust fluid ("DEF"), into the exhaust stream where it reacts with a catalyst to convert Nitrogen Oxides ("NO_x") emissions to Nitrogen Gas ("N₂") and Water.
- 14. The term "onboard diagnostics" or "OBD" includes systems which monitor components emission-related systems, and assists repair technicians in diagnosing and fixing problems with

those emission-related systems. If a problem is detected, an OBD system should record a Diagnostic Trouble Code ("DTC"), illuminate a Malfunction Indicator Light ("MIL") or other warning lamp on the vehicle instrument panel, and/or provide information to the ECM which induces engine derate due to malfunctioning or missing emission-related systems.

- 15. The term "exhaust gas recirculation" or "EGR" includes systems which redirect, usually by use of an EGR valve, a portion of engine exhaust back into the engine's combustion chamber to cool and reduce peak combustion temperatures and pressures, thereby reducing the production of NOx. The EGR system may include an EGR cooler to cool the recirculated exhaust to further reduce the combustion temperature.
- 16. The term "Diesel Particulate Filter" or "DPF" refers to an exhaust aftertreatment device that physically traps particulate matter ("PM") and removes it from the exhaust stream of diesel fueled vehicles and equipment, typically using a porous ceramic or cordierite substrate or metallic filter.
- 17. The term "manufacture" includes, but is not limited to, the creation, design, development, alteration, fabrication, production, or programming of a software code, software, hardware, program, element of design, calibration, engine tune, engine tuner, device, part, or component.
- 18. The term "Engine Derate" or "Limp-Home Mode" means an electronic control module mode that reduces the engine power after the On-Board Diagnostic system identifies a problem with the emission control equipment.
- 19. The term "catalysts" refers to systems which increase the rate of a chemical reaction but are not one of the original reactants or final products, *i.e.*, the catalyst is not consumed or altered in the reaction. The term "catalysts" includes emission control catalysts, which typically consist of a flow-through structure coated with an active metal catalyst and surrounded by a stainless steel housing, and are used to promote reactions that change exhaust pollutants from internal combustion engines. Recent model year diesel engines are equipped with emission control catalysts known as Diesel Oxidation Catalysts or ("DOCs").

Appendix B Instructions for Responses

- 1. Provide a complete, detailed response to each of the requests in Appendix C, below. Provide any narrative responses or lists in English.
- 2. The EPA will provide an Excel workbook as Appendix F to help organize your responses to Requests 1 through 6. Please contact Tony Miller, at (303) 312-7161 or miller.anthony@epa.gov, to coordinate receipt of an electronic copy of the workbook. Please populate the workbook with your responses to Requests 1 through 6 in accordance with all instructions here and therein. Requests 1 through 6 are summarized in Appendix F for your convenience. The summaries in Appendix F are intended to be substantively identical to the Requests in Appendix C.
- 3. Provide your responses to Request 7 in electronic form (e.g., .pdf documents).
- 4. For Requests 1.b, 6.k, and 7, provide all documents electronically in a folder specific to that question or subpart (*e.g.*, documents responsive to question 1.b would be located within an electronic folder specifically designated for question 1.b).
- 5. This Request for Information is a continuing request. You must promptly supplement your response to any Request in Appendix C in the event you learn that you possess responsive information not yet produced or if you gain possession, custody, or control of responsive information after initially responding to this Request for Information.
- 6. For each answer, please provide the number of the request to which it responds and identify each person who provided information that was used to prepare that answer. For each document produced, please provide the number of the request to which it responds.
- 7. When a response is provided in the form of a number, specify the units of measure of the number in a precise manner.
- 8. Where documents or information necessary for a response is not in your possession, custody, or control, indicate in your response why such documents or information are not available or in your possession, custody, or control, and identify any source that either possesses or is likely to possess such information.
- 9. All submitted documents should be copies and not original documents.
- 10. Where you have previously submitted information to the EPA that is also the subject of this Request for Information, re-submit that information in accordance with these instructions (Appendix B). Identify the material that was previously provided, the date on which it was

provided, how the information was provided (*e.g.*, electronically, fax, mail), and the individual at the EPA to whom it was provided. The requirements of this instruction do not apply to information submitted in response to the EPA's prior information request.

11. Please provide two copies of your response to this Request for Information in electronic form. Please provide the Statement(s) of Certification (Appendix E) in hard copy form with two electronic copies of your response. All responsive documents and materials (*e.g.*, copies of print media, audio, and visual material) must be provided as an accurate and legible copy in searchable format, submitted on a disk (CD or DVD media), and number stamped in sequential order (*e.g.*, BATES stamped). Where spreadsheets are responsive to a request, produce them in unlocked electronic spreadsheet format, such as .xls or .csv (locked spreadsheets, .pdf files and images are unacceptable). Please contact Tony Miller if providing the information electronically will be an issue.

Appendix C Request for Information

You must submit the following information to the EPA, pursuant to Section 208 of the CAA, 42 U.S.C. § 7542, regarding the manufacture, distribution, sale and/or offering for sale of certain parts and components during the period January 1, 2013, through December 31, 2015.

Provide the following information in Appendix F. Note: Appendix F has two worksheets.

- 1. For each product identified in your February 1, 2016 response to the Request for Information dated October 28, 2015, and further identified in Appendix F, Worksheets 1 & 2, provide:
 - a. The quantity you sold domestically between November 3, 2015 and December 31, 2015;
 - b. A copy of any invoice for each sale.
- 2. For each product identified in your February 1, 2016 response to the Request for Information dated October 28, 2015, and further identified in Appendix F, Worksheet 1 & 2, provide the:
 - a. Quantity you purchased between January 1, 2013, and December 31, 2015; and
 - b. Average price you paid for each product;
- 3. For each product identified in your February 1, 2016 response to the Request for Information dated October 28, 2015, and further identified in Appendix F, Worksheet 1, indicate:
 - a. Whether the product is an engine tuner sold without engine tunes;
 - b. Whether the product is an engine tuner sold with engine tunes from the engine tuner manufacturer:
 - c. Whether the product is an engine tuner sold with engine tunes manufactured by PPEI;
 - d. Whether the product is an engine tune manufactured by PPEI and sold without an engine tuner; and
 - e. If the answer to all of the previous four questions is no, describe the product in detail.
- 4. For each product identified in your February 1, 2016 response to the Request for Information dated October 28, 2015, and further identified in Appendix F, Worksheet 1, indicate:
 - a. Whether the product is capable of disabling the EGR without illuminating a MIL or prompting any on-board DTC;
 - b. Whether you have sold a version of the product that, upon installation and without postsale modification of the product, disables or allows the end user to disable the EGR without illuminating a MIL or prompting any DTC;
 - c. Whether the product is capable of disabling the EGR without any engine derating;
 - d. Whether you have sold a version of the product that, upon installation and without postsale modification of the product, disables or allows the end user to disable the EGR without any engine derating;
 - e. Whether the product is capable of allowing the removal of the EGR without illuminating

- a MIL or prompting any on-board DTC;
- f. Whether you have sold a version of the product that, upon installation and without post-sale modification of the product, allows the removal of the EGR without illuminating a MIL or prompting any DTC;
- g. Whether the product is capable of allowing the removal of the EGR without any engine derating;
- h. Whether you have sold a version of the product that, upon installation and without postsale modification of the product, allows the removal of the EGR without any engine derating;
- i. Whether the product is capable of allowing removal of a DPF without illuminating a MIL or prompting any DTC;
- j. Whether you have sold a version of the product that, upon and without post-sale modification of the product, allows the removal of the DPF without illuminating a MIL or prompting any DTC;
- k. Whether the product is capable of allowing removal of a DPF without any engine derating;
- 1. Whether you have sold a version of the product that, upon installation and without post-sale modification of the product, allows removal of a DPF without any engine derating;
- m. Whether the product is capable of allowing removal of a Diesel Oxidation Catalyst without illuminating a MIL or prompting any DTC;
- n. Whether you have sold a version of the product that, upon installation and without postsale modification of the product, allows removal of a Diesel Oxidation Catalyst without illuminating a MIL or prompting any DTC;
- o. Whether the product is capable of allowing removal of a Diesel Oxidation Catalyst without any engine derating;
- p. Whether you have sold a version of the product that, upon installation and without postsale modification of the product, allows removal of a Diesel Oxidation Catalyst without any engine derating;
- q. Whether the product is capable of allowing removal of a SCR system without illuminating a MIL or prompting any DTC;
- r. Whether you have sold a version of the product that, upon installation and without post-sale modification of the product, allows removal of a SCR system without illuminating a MIL or prompting any DTC;
- s. Whether the product is capable of allowing removal of a SCR system without any engine derating;
- t. Whether you have sold a version of the product that, upon installation and without postsale modification of the product, allows removal of a SCR system without any engine derating;
- u. Whether the product is capable of altering fuel timing maps within engine electronic calibrations;
- v. Whether you have sold a version of the product that, upon installation and without post-

- sale modification of the product, alters fuel timing maps within engine electronic calibrations:
- w. Whether the product is capable of bypassing or altering parameters to prevent DTCs or MILs from being recorded or illuminated; and
- x. Whether you have sold a version of the product that, upon installation and without post-sale modification of the product, prevents DTCs or MILs from being recorded or illuminated.
- 5. For each product identified in your February 1, 2016 response to the Request for Information dated October 28, 2015, and further identified in Appendix F, Worksheet 1, provide a description of the product and how the product differs from the stock calibration or specifically changes the stock calibration. You may submit engine calibration maps (e.g., Mass Fuel Maps, Injection Duration Maps, etc.). Any engine calibration map you submit must have a description of the map and specify how the product modifies the map.
- 6. For each product identified in your response to the Request for Information dated October 28, 2015, and further identified in Appendix F, Worksheet 2, identify:
 - a. All stock components each product replaces;
 - b. Whether the product physically replaces or allows the removal of the Diesel Particulate Filter;
 - c. Whether the product contains a Diesel Particulate Filter;
 - d. Whether the product physically replace or allow the removal of the Diesel Oxidation Catalyst;
 - e. Whether the product contains a Diesel Oxidation Catalyst;
 - f. Whether the product physically replaces or allows the removal of the Selective Catalytic Reduction System;
 - g. Whether the product contains a Selective Catalytic Reduction System;
 - h. Whether the product physically replaces or blocks off the Exhaust Gas Recirculation System;
 - i. Whether the product allows the Exhaust Gas Recirculation System to operate as originally designed;
 - j. Describe how each product differs from the stock components or specifically changes the stock configuration. You may provide owner's or installation manuals for a product in lieu of a narrative description; and
 - k. If providing the owners or installation manuals in an electronic format, identify the electronic file name associated with each manual provided.

Provide the following information.

7. For each product identified in your February 1, 2016 response to the Request for Information dated October 28, 2015, provide a copy of any invoice for each domestic sale not already provided with your previous response.

Appendix D Confidential Business Information

You may assert a business confidentiality claim covering all or part of the information you provide in response to this Request for Information for any business information entitled to confidential treatment under Section 208(c) of the CAA, 42 U.S.C. § 7542, and 40 C.F.R. Part 2, subpart B. Under Section 208(c) of the CAA, you are entitled to confidential treatment of information that would divulge methods or processes entitled to protection as trade secrets. Under 40 C.F.R. Part 2, subpart B, business confidentiality means "the concept of trade secrecy and other related legal concepts which give (or may give) a business the right to preserve the confidentiality of business information and to limit its use or disclosure by others in order that the business may obtain or retain business advantages it derives from its rights in the information." 40 C.F.R. § 2.201(e).

Information covered by a claim of business confidentiality will be disclosed by the EPA only to the extent, and by means of the procedures, set forth in Section 208(c) of the CAA and 40 C.F.R. Part 2, subpart B. EPA will construe your failure to furnish a business confidentiality claim with your response to this Request for Information as a waiver of that claim, and the information may be made available to the public without further notice to you.

To assert a business confidentiality claim, you must place on (or attach to) all information you desire to assert as business confidential either a cover sheet, stamped or typed legend, or other suitable form of notice employing language such as "trade secret," "proprietary," or "company confidential" at the time you submit your response to this Request for Information. Allegedly confidential portions of otherwise non-confidential documents should be clearly identified, and may be submitted separately to facilitate identification and handling by the EPA. You should indicate if you desire confidential treatment only until a certain date or until the occurrence of a certain event.

The criteria the EPA will use in determining whether material you claim as business confidential is entitled to confidential treatment are set forth at 40 C.F.R. §§ 2.208 and 2.301. These regulations provide, among other things, that you must satisfactorily show that: (1) the information is within the scope of business confidentiality as defined at 40 C.F.R. § 2.201(e), (2) that you have taken reasonable measures to protect the confidentiality of the information and that you intend to continue to do so, (3) the information is not and has not been reasonably obtainable by legitimate means without your consent, and (4) the disclosure of the information is likely to cause substantial harm to your business competitive edge. *See* 40 C.F.R. §§ 2.208 (a)-(e). Emission data, as defined at 40 C.F.R. § 2.301(a)(2), is expressly not entitled to confidential treatment under 40 C.F.R. Part 2, subpart B. *See* 42 U.S.C. § 7542(c); 40 C.F.R. § 2.301(e).

If you assert a claim of business confidentiality in connection with information and documents forwarded in response to this Request for Information, in accordance with 40 C.F.R. § 2.204(e)(4), the EPA is requesting that you answer the following requests with respect to any information or document for which you assert a claim of business confidentiality:

- 1. What specific portions of the information are allegedly to be entitled to confidential treatment? Specify by page, paragraph, and sentence when identifying the information subject to your claim.
- 2. For what period of time do you request that the information be maintained as confidential (*e.g.*, until a certain date, until the occurrence of a specified event or permanently)? If the occurrence of a specific event will eliminate the need for confidentiality, specify that event. Additionally, explain why the information should be protected for the time period you have specified.
- 3. What measures have you taken to protect the information claimed as confidential from undesired disclosure? Have you disclosed the information to anyone other than a governmental body or someone who is bound by an agreement not to disclose the information further? If so, why should the information still be considered confidential?
- 4. Is the information contained in any publicly available material such as the Internet, publicly available databases, promotional publications, annual reports or articles? Is there any means by which a member of the public could obtain access to the information? Is the information of a kind that you would customarily not release to the public?
- 5. Has any governmental body made a determination as to the confidentiality of the information? If so, please attach a copy of the determination.
- 6. For each category of information claimed as confidential, explain with specificity whether disclosure of the information is likely to result in substantial harm to your competitive position. Explain the specific nature of that harm, why they should be viewed as substantial, and the causal relationship between disclosure and such harmful effect. How could your competitors make use of this information to your detriment?
- 7. Is there any other explanation you deem relevant to the EPA's determination of your business confidentiality claim that is not covered in the preceding requests? If so, you may provide such additional explanation.

You must furnish comments to the above requests concurrent with your response to this Request for Information if you have claimed any information as business confidential. *See* 40 C.F.R. § 2.204(e)(2). Pursuant to 40 C.F.R. § 2.205(b)(2), you may request an extension of this deadline.

The EPA will construe your failure to furnish timely comments as a waiver of your confidentiality claim, consistent with 40 C.F.R. § 2.204(e)(1). Please submit your comments to:

Tony Miller, Chemical Engineer, P.E. U.S. Environmental Protection Agency Office of Enforcement and Compliance Assurance 1595 Wynkoop Street, Mail Code: 8MSU Denver, CO 80202

Pursuant to 40 C.F.R. § 2.205(c), you are hereby advised that information you submit as part of your comments may be entitled to confidential treatment if, when it is received by the EPA, it is marked in accordance with 40 C.F.R. § 2.203(b). As required by 40 C.F.R. § 2.204(e)(6), you may assert a business confidentiality claim covering all or part of your response to these requests, as provided in 40 C.F.R. § 2.203(b). Information covered by such a business confidentiality claim will be disclosed by the EPA only to the extent, and by means of the procedures, set forth in Section 208(c) of the CAA and 40 C.F.R. Part 2. The EPA will construe the failure to furnish a confidentiality claim with your comments as a waiver of that claim, and the information may be made available to the public without further notice to you.

Appendix E Statement of Certification

You are submitting the enclosed documents in response to the U.S. Environmental Protection Agency's ("EPA") Request for Information, issued pursuant to Section 208(a) of the Clean Air Act, to determine compliance with the Clean Air Act and its affiliated regulations.

compliance with the Clean Air Act and its affiliated regulations.
I certify that I am fully authorized by [corporate affiliation] to provide the above information on its behalf to EPA.
I certify under penalty of law that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including the possibility of fines or imprisonment pursuant to Section 113(c)(2) of the Clean Air Act, 42 U.S.C. § 7413(c)(2), and 18 U.S.C. §§ 1001 and 1341.
Date:
Name (Printed):
Signature:
Title:

CERTIFICATE OF MAILING

I, Edward Kulschinsky, certify that on this day I sent a Request for Information pursuant to Section 208 of the Clean Air Act by Certified Mail, Return Receipt requested, to:

Adrenaline Truck Performance, LLC 1854 E. Lanark St. Meridian, ID 83642

Registered Agent for Adrenaline Truck Performance LLC: Robert Coddens 1854 E. Lanark St. Meridian, ID 83642

Robert Coddens, Member 3073 E. Red Tail Eagle, ID 83616

Emily C. Schilling Holland & Hart LLP Suite 2200 Salt Lake City, UT 84101

Date: 4/28/2016

For Edward Kulschinsky, Attorney-Adviser
U.S. Environmental Protection Agency